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Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

KELLY H. CROWELL, }
Plaintiff, } CIVIL NO. 05-02170 CW
v. }
STIPULATION AND ORDER EXTENDING
JO ANNE B. BARNHART, } DEFENDANT'S TIME TO FILE
Commissioner of Social Security, } RESPONSE TO PLAINTIFF'S
Defendant. } MOTION FOR SUMMARY JUDGMENT

IT IS HEREBY STIPULATED by and between the undersigned attorneys, subject to the approval of the Court, that defendant Commissioner may have an extension of 30 days in which to file her response to plaintiff's motion for summary judgment.¹ Defendant's response was due on November 9, 2005, pursuant to Civil L.R.16-5. Defendant's response is now due on December 9, 2005.

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¹ See attached Declaration of Sharon Sands.

1 This is defendant's first request.
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5 Dated: November 9, 2005

/s/
6 LEZLEY D. CROWELL
Attorney for Plaintiff

7 KEVIN V. RYAN
8 United States Attorney

12 Dated: November 9, 2005

By: /s/
13 SARA WINSLOW
Assistant United States Attorney

14 PURSUANT TO STIPULATION, IT IS SO ORDERED:
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19 Dated: 11/14/05


20 CLAUDIA WILKEN
21 United States District Judge

KEVIN V. RYAN, CSBN 118321
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Attorneys for Defendant

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

KELLY H. CROWELL,
Plaintiff,
v.
JO ANNE B. BARNHART,
Commissioner of
Social Security,
Defendant.

CIVIL NO. C-05-02170 CW

DECLARATION IN SUPPORT OF
DEFENDANT'S REQUEST FOR
EXTENSION OF TIME

I, Sharon Sands, declare and state as follows:

1. I am an Assistant Regional Counsel in the Office of the General Counsel for the United States Social Security Administration, Region IX.

2. I am requesting a 30-day extension for filing Defendant Commissioner's response to Plaintiff's motion for summary judgment due to work load constraints which stemmed from a lengthy illness on my part and a recent re-assignment of this matter, to myself, during that time period.

1 3. Accordingly, I pray this request for more time be granted in order to provide myself with
2 the opportunity for review and analysis of this case.

3 I declare under penalty of perjury that the foregoing is true and correct to the best of my
4 knowledge.

5 Executed in San Francisco, California on November 8, 2005.

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9 By /s/
10 Sharon Sands
11 Assistant Regional Counsel
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